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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 MARLENE AGUILAR-GILES, an individual, Case No.: 2:17-cv-3096

9 Plaintiff,

10 vs.

**Stipulation and Order to Extend Discovery  
(First Request)**

11 CARDENAS MARKETS, INC., a foreign  
corporation; DOES I through X; and ROE  
12 BUSINESS ENTITIES I through X, inclusive,

13 Defendants.

14 The parties stipulate to extend discovery and request an amended scheduling order.

15 **I. LR 6-1 is satisfied.**

16 This is the parties' first request for extension. The principle purpose is due to Plaintiff's  
17 recommended future medical treatment. Cardenas requires additional time to assess the medical  
18 treatment Plaintiff recently disclosed so as to prepare for medical expert disclosures. The  
19 deadlines at issue have not yet expired.

20 This request is submitted within 21 days of the deadlines it seeks to extend. However the  
21 Cardenas did not receive the formal report from Plaintiff's treating physician specifically  
22 recommending future treatment until shortly after it was served on March 23. Plaintiff's  
23 disclosure was timely, but Cardenas simply requires additional time to assess it.

24 **II. LR 26-4 is satisfied**

25 Both parties have served Rule 26(a)(1) disclosures and have responded to written  
26 discovery. No depositions have yet been taken. The remaining discovery includes depositions  
27 of witnesses and expert disclosures. This is a personal injury lawsuit and medical experts are  
28 necessary for both parties.

1 **III. Current and proposed schedule for completing discovery.**

	<b>Current Schedule</b>	<b>Proposed Schedule</b>
<b>Motions to add parties and amend pleadings</b>	March 19, 2018	Closed
<b>Initial expert disclosures and interim status report</b>	April 18, 2018	June 18, 2018
<b>Rebuttal expert disclosures</b>	May 18, 2018	July 18, 2018
<b>Close of Discovery</b>	June 18, 2018	August 17, 2018
<b>Dispositive motions</b>	July 17, 2018	September 17, 2018
<b>Pre-Trial Order</b>	August 16, 2018	October 12, 2018

DATED this 30 <sup>th</sup> day of March, 2018.	DATED this 30 <sup>th</sup> day of March, 2018.
WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP	HUTCHINGS LAW GROUP, LLC
<u>/s/ Michael P. Lowry</u> Michael P. Lowry, Esq. Nevada Bar No. 10666 300 South Fourth Street, 11 <sup>th</sup> Floor Las Vegas, Nevada 89101-6014 Tel: 702.727.1400/Fax: 702.727.1401 Attorneys for Cardenas Markets, Inc.	<u>/s/ Mark H. Hutchings</u> Mark H. Hutchings, Esq. Nevada Bar No. 12783 552 E. Charleston Blvd. Las Vegas, Nevada 89104 Tel: 702.660.7700/Fax: 702.552.5202 Attorneys Marlene Aguilar-Giles

14 IT IS SO ORDERED.

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UNITED STATES MAGISTRATE JUDGE

18 DATED: April 2, 2018

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☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;

☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

BY: /s/ Naomi E. Sudranski  
An Employee of WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP